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Michael A. Hanson
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Environmental Affairs

June 27, 1990

Walter K. Wilkie
NESHAP Coordinator
Air Management Division
USEPA, Region III
841 Chestnut Building
Philadelphia, PA 19107

Re: **Clairton Works Request
for Waiver of Compliance 40 CFR 61, Subpart L -
"National Emission Standard for Benzene Emissions
from Coke By-Product Recovery Plants"**

Dear Mr. Wilkie:

Ron McCollum and I appreciated the opportunity to discuss with you and Susan Insetta on June 7 the benzene NESHAP emission control project for the Clairton Works coke by-product recovery plants. As you requested, we have reviewed the information we provided during the meeting and have attached hereto revised scopes of work for each source covered.

As we discussed, some tanks will be cleaned and rehabilitated prior to gas blanketing. Others will be cleaned and demolished and replaced with new tanks and the new tanks will be gas blanketed. In some cases, it is not yet apparent if certain tanks will be rehabilitated or if they will be demolished and replaced by new tanks. We have included "alternate scopes of work" for these tanks.

Because of the magnitude of this project and in order to maintain operations during construction, it will be necessary to keep certain tanks, which are ultimately scheduled for demolition, in operation until other tanks are rehabilitated or replaced and gas blanketed. These "transition" tanks will then be cleaned and demolished. They are identified in the scopes by excluding the words "install gas blanketing."

Certain tanks are presently out of service and will be demolished without putting them back into service and others have already been demolished. These two categories include the following:

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Unit No. 1

Item 31.0 Light Oil Tank No. 421

Item 32.0 Light Oil Tank No. 422

Unit No. 2

Item 14.0 Tar Collecting Tank No. 6

Item 37.0 No. 9 Creosote Vented Vapor Tank

Item 38.0 Tar Loading Tank

Item 41.0 Ammonia Storage Tank No. 3

Item 42.0 Ammonia Storage Tank No. 4

We plan to submit project schedules to you in approximately five weeks. In the meantime, don't hesitate to call if you have any questions.

Finally, I appreciate your June 27 phone call confirming that PSD permits will not be required for new tanks to be built for this project.

Very truly yours,



MAH/cg

attachment

cc: Susan M. Insetta - Region III USEPA
Charles J. Goetz - BAPC
Ward D. Kelsey - PaDER
Ron H. McCollum - Clairton

bc: G. E. Cason
J. M. Connelly
R. Dworek
R. A. Funwela
P. S. Kiswardy
D. G. Kundich
W. E. Little
P. X. Masciantonio
J. D. Moniot
S. K. Todd
G. T. Weber

JUNE 22, 1990

NESHAPS - TANK EMISSIONS AND CONTAINMENT PROGRAM

SUMMARY - SCOPE OF WORK

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UNIT NO. 1

1.0 F.L. WEIR TANK NO. 1

Overall dimensions - 6 ft. Dia. x 14 ft. H
Construction - Cast iron, vertical, with
asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove asbestos-containing mastic (200 sq ft)
- Install Dike containment (as part of tank farm)

2.0 F.L. WEIR TANK NO. 2

Overall dimensions - 8 ft. Dia. x 14 ft. H
Construction - Cast iron, vertical, with
asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove asbestos-containing mastic (200 sq ft)
- Install Dike containment (as part of tank farm)

3.0 F.L. DECANTER NO. 1

Capacity - 80,000 gallons
Overall dimensions - 28 ft. W x 12.5 ft. H x 56 ft. Lg
Construction - Welded steel, horizontal with asbestos-
containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (4200 gal)
- Remove asbestos-containing mastic (2100 sq ft)

- Install dike containment (as part of tank farm)
- Apply new 1-1/2" urethane foam insulation

4.0 F.L. DECANTER NO. 2

Capacity - 80,000 gallons
 Overall dimensions - 28 ft. W x 12.5 ft. H x 56 ft. Lg
 Construction - Welded steel, horizontal, with concrete roof and asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge (4200 gal)
- Remove asbestos-containing mastic (2100 sq ft)
- Install Dike containment (as part of tank farm)
- Apply new 1-1/2" urethane foam insulation

5.0 F.L. DECANTER NO. 3

Capacity - 80,000 gallons
 Overall dimensions - 28 ft. W x 12.5 ft. H x 56 ft. Lg
 Construction - Welded steel, horizontal, with urethane foam insulation

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (4200 gal)
- Remove urethane foam insulation (2100 sq ft)
- Install Dike containment (as part of tank farm)
- Apply new 1-1/2" urethane foam insulation

6.0 F.L. DECANTER NO. 4

Capacity - 80,000 gallons
 Overall dimensions - 28 ft. W x 12.5 ft. H x 56 Ft. Lg.
 Construction - Welded steel, horizontal, with asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel (4200 gal)
- Remove asbestos-containing mastic (2100 sq ft)
- Install Dike containment (as part of tank farm)
- Apply new 1-1/2" urethane foam insulation

7.0 F.L. DECANTER NO. 5

Capacity - 80,000 gallons
Overall dimensions - 28 ft. W x 12.5 ft. H x 56 Ft. Lg
Construction - Welded steel, horizontal, with urethane foam insulation

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (4200 gal)
- Remove urethane foam insulation (2100 sq ft)
- Install Dike containment (as part of tank farm)
- Apply new 1-1/2" urethane foam insulation

8.0 F.L. DECANTER NO. 6

Capacity - 80,000 gallons
Overall dimensions - 28 ft. W x 12.5 ft. H x 56 Ft. Lg
Construction - Welded steel, horizontal, with urethane foam insulation

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (4200 gal)
- Remove urethane foam insulation (2100 sq ft)
- Install Dike containment (as part of tank farm)
- Apply new 1-1/2" urethane foam insulation

8.0 TAR COLLECTING TANK NO. 1

Capacity - 24,000 gallons
Overall dimensions - 10 ft. Dia. x 40 ft. Lg
Construction - Welded steel, horizontal, with asbestos- containing mastic and asbestos blanket insulation

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (1000 gal)
- Remove asbestos-containing mastic (1400 sq ft)
- Remove asbestos blanket insulation (1400 sq ft)
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. Jacketing

10.0 TAR COLLECTING TANK NO. 2

Capacity - 24,000 gallons
Overall dimensions - 10 ft. Dia. x 40 ft. Lg
Construction - Welded steel, horizontal, with
asbestos-containing mastic and
asbestos blanket insulation

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (1000 gal)
- Remove asbestos-containing mastic (1400 sq ft)
- Remove asbestos blanket insulation (1400 sq ft)
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. jacketing

11.0 TAR COLLECTING TANK NO. 3

Capacity - 24,000 gallons
Overall dimensions - 10 ft. Dia. x 40 ft. Lg
Construction - Welded steel, horizontal, with asbestos-
containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (1000 gal)
- Remove asbestos-containing mastic (1400 sq ft)
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. jacketing

12.0 TAR COLLECTING TANK NO. 4

Capacity - 24,000 gallons
Overall dimensions - 10 ft. Dia. x 40 ft. Lg
Construction - Welded steel, horizontal, with
asbestos-containing mastic and
asbestos blanket insulation

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (1000 gal)
- Remove asbestos-containing mastic (1400 sq ft)
- Remove asbestos blanket insulation (1400 sq ft)
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. jacketing

13.0 F.L. SURGE TANK NO. 1

Capacity - 50,000 gallons
Overall dimensions - 28.5 ft. Dia. x 11 Ft. H
Construction - Welded steel, vertical, with
asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel (10,000 gal)
- Remove asbestos-containing mastic (1000 sq ft)
- Install Dike containment (as part of tank farm)

14.0 F.L. SURGE TANK NO. 2

Capacity - 50,000 gallons
Overall dimensions - 28.5 ft. Dia. x 11 Ft. H
Construction - Welded steel, vertical, with
asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel (10,000 gal)
- Remove asbestos-containing mastic (1000 sq ft)
- Install Dike containment (as part of tank farm)

15.0 F.L. SURGE TANK NO. 3

Capacity - 50,000 gallons
Overall dimensions - 28.5 ft. Dia. x 11 ft. H
Construction - Riveted steel, vertical with
asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (10,000 gal)
- Remove asbestos-containing mastic (1000 sq ft)
- Install Dike containment (as part of tank farm)

ALTERNATE SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel

- Remove asbestos-containing mastic
- Install Dike containment (as part of tank farm)

16.0 TAR STORAGE TANK NO. 1

Capacity - 500,000 gallons
 Overall dimensions - 50 ft. Dia. x 35.75 Ft. H
 Construction - Riveted steel, vertical, with
 asbestos-containing mastic and
 fiberglass blanket insulation

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (200,000 gal)
- Remove fiberglass blanket insulation (5600 sq ft)
- Remove asbestos-containing mastic (5600 sq ft)
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. Jacketing

ALTERNATE SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel
- Remove fiberglass blanket insulation
- Remove asbestos-containing mastic
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. Jacketing

17.0 TAR STORAGE TANK NO. 2

Capacity - 500,000 gallons
 Overall dimensions - 50 ft. Dia. x 35.75 Ft. H
 Construction - Riveted steel, vertical, with
 asbestos-containing mastic and
 fiberglass blanket insulation ..

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (200,000 gal)
- Remove fiberglass blanket insulation (5600 sq ft)
- Remove asbestos-containing mastic (5600 sq ft)
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. Jacketing

ALTERNATE SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank

- Erect replacement tank (in-kind)
- Remove sludge heel
- Remove fiberglass blanket insulation
- Remove asbestos-containing mastic
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. jacketing

18.0 TAR STORAGE TANK NO. 3

Capacity - 500,000 gallons
 Overall dimensions - 50 ft. Dia. x 35.75 Ft. H
 Construction - Riveted steel, vertical, with
 asbestos-containing mastic and
 fiberglass blanket insulation

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (200,000 gal)
- Remove fiberglass blanket insulation (5600 sq ft)
- Remove asbestos-containing mastic (5600 sq ft)
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. jacketing

ALTERNATE SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel
- Remove fiberglass blanket insulation
- Remove asbestos-containing mastic
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. jacketing

19.0 TAR STORAGE TANK NO. 4

Capacity - 500,000 gallons
 Overall dimensions - 50 ft. Dia. x 35.75 Ft. H
 Construction - Riveted steel, vertical, with
 asbestos-containing mastic and
 fiberglass blanket insulation

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (200,000 gal)
- Remove fiberglass blanket insulation (5600 sq ft)
- Remove asbestos-containing mastic (5600 sq ft)
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. jacketing

ALTERNATE SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel
- Remove fiberglass blanket insulation
- Remove asbestos-containing mastic
- Install Dike containment (as part of tank farm)
- Apply 2" fiberglass insulation w/ S.S. jacketing

20.0 TAR SEPARATING TANK NO. 1

Capacity - 350,000 gallons
Overall dimensions - 38.5 ft. Dia x 44 ft. H
Construction - Riveted steel, vertical, with
asbestos-containing mastic and
fiberglass blanket insulation

SCOPE OF WORK:

- Remove sludge heel (200,000 gal)
- Remove asbestos-containing mastic (5300 sq ft)
- Remove fiberglass blanket insulation (5300 sq ft)
- Demolish tank

21.0 TAR SEPARATING TANK NO. 2

Capacity - 350,000 gallons
Overall dimensions - 38.5 ft. Dia x 44 ft. H
Construction - Riveted steel, vertical, with
asbestos-containing mastic and
fiberglass blanket insulation

SCOPE OF WORK:

- Remove sludge heel (200,000 gal)
- Remove asbestos-containing mastic (5300 sq ft)
- Remove fiberglass blanket insulation (5300 sq ft)
- Demolish tank

22.0 AMMONIA LIQUOR STORAGE TANK NO. 1

Capacity - 300,000 gallons
Overall dimensions - 36.5 ft. Dia x 40 ft. H
Construction - Welded steel, vertical, with
asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (40,000 gal)
- Remove asbestos-containing mastic (4600 sq ft)
- Install Dike containment (as part of tank farm)

ALTERNATE SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel
- Remove asbestos-containing mastic
- Install Dike containment (as part of tank farm)

23.0 AMMONIA LIQUOR STORAGE TANK NO. 2

Capacity - 300,000 gallons
Overall dimensions - 38.5 ft. Dia x 40 ft. H
Construction - Welded steel, vertical, with
asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank
- Remove sludge heel (40,000 gal)
- Remove asbestos-containing mastic (4600 sq ft)
- Install Dike containment (as part of tank farm)

ALTERNATE SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel
- Remove asbestos-containing mastic
- Install Dike containment (as part of tank farm)

24.0 WWT SETTLING TANK NO. 1

Capacity - 138,000 gallons
Overall dimensions - 30 ft. Dia. x 26 ft. H
Construction - Welded steel, vertical, with
asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)

- Remove sludge heel (20,000 gal)
- Remove asbestos-containing mastic (2500 sq ft)

25.0 WWT SETTLING TANK NO. 2

Capacity - 138,000 gallons
 Overall dimensions - 30 ft. Dia. x 26 ft. H
 Construction - Welded steel, vertical with asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel (20,000 gal)
- Remove asbestos-containing mastic (2500 sq ft)

26.0 WWT SETTLING TANK NO. 3

Capacity - 138,000 gallons
 Overall dimensions - 30 ft. Dia. x 26 ft. H
 Construction - Welded steel, vertical,
 with asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel (15,000 gal)
- Remove asbestos-containing mastic (2500 sq ft)

27.0 WWT SETTLING TANK NO. 4

Capacity - 138,000 gallons
 Overall dimensions - 30 ft. Dia. x 26 ft. H
 Construction - Welded steel, vertical with
 asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel (15,000 gal)
- Remove asbestos-containing mastic (2500 sq ft)

28.0 WWT SETTLING TANK NO. 5

Capacity - 100,000 gallons
 Overall dimensions - 30 ft. Dia. x 22 ft. H
 Construction - Welded steel, vertical,
 with asbestos-containing mastic

SCOPE OF WORK:

- Install Gas Blanketing
- Demolish tank
- Erect replacement tank (in-kind)
- Remove sludge heel (10,000 gal)
- Remove asbestos-containing mastic (2500 sq ft)

29.0 PRIMARY COOLER CONDENSATE SUMP

Capacity - 50,000 gallons
Overall dimensions - 17 ft. W x 18 ft. D x 22 ft. Lg.
Construction - Concrete sump w/ steel cover

SCOPE OF WORK:

- Install Gas Blanketing
- Rehabilitate tank

30.0 PRIMARY COOLER LIQUOR CONDENSATE PUMPS

Qty: Two (2) Vertical Sump
Rating: 500 gpm
1.0 S.G. @ 150 F

SCOPE OF WORK:

- Demolish pumps
- Install replacement pumps (in-kind)

31.0 LIGHT OIL TANK NO. 421

Capacity - 500,000 gallons
Overall dimensions - 53 ft. Dia. x 35.75 ft. H
Construction - Riveted steel, vertical, with
asbestos-containing mastic

SCOPE OF WORK:

- Remove asbestos-containing mastic (6000 sq ft)
- Remove sludge heel (100,000 gal)
- Demolish tank (TANK IS PRESENTLY OUT OF SERVICE)

32.0 LIGHT OIL TANK NO. 422

Capacity - 500,000 gallons
Overall dimensions - 53 ft. Dia. x 35.75 ft. H
Construction - Riveted steel, vertical, with
asbestos-containing mastic

SCOPE OF WORK:

- Remove asbestos-containing mastio (6000 sq ft)
- Remove sludge heel (100,000 gal)
- Demolish tank (TANK IS PRESENTLY OUT OF SERVICE)

33.0 LIGHT OIL PUMP NO. P-422

.. Two (2) Horizontal centrifugal (1-Steam, 1-Electric)

SCOPE OF WORK:

- Demolish pumps